## **REMARKS**

In the Office Action, the Examiner rejected Claims 1-15, which were all of the then pending claims, over the prior art, primarily U.S. Patent 6,687,873 (Ballantyne, et al.). In particular, Claims 1, 2, 5-7, 10-12 and 15 were rejected under 35 U.S.C. 102 as being fully anticipated by Ballantyne, et al; and Claims 3, 4, 8, 9, 13 and 14 were rejected under 35 U.S.C. 103 as being unpatentable over Ballantyne, et al. in view of U.S. Patent 6,292,932 (Baisley, et al.).

Independent Claims 1, 6 and 11 are herein being amended to better define the subject matters of these claims. Also, new Claim 16, which is dependent from Claim 1, is being added to describe a preferred feature of this invention.

For the reasons advanced below, Claims 1-16 patentably distinguish over the prior art and are allowable. The Examiner is thus asked to reconsider and to withdraw the above-identified rejections of Claims 1-15 and to allow these claims and new Claim 16.

The present invention, generally, relates to methods and systems for converting data files to a specified format, and this invention is particularly well suited for converting data files to an XML format. As explained in the present application, there is a need to convert legacy data to an XML format; however, there currently is no widely applicable, generalized and automated technique to do this.

The present invention addresses this need. The instant invention does this by providing a parser that can be used on its own or as part of a larger system to convert large amounts of data quickly to an XML formal. More specifically, this is done by use of a unique map file having a given set of tags and attributes, by forming a tree structure from this map file, and then using that tress structure to form an XML file.

To convert a flat file having legacy data, a map file is defined having tags and attributes. Also, each column heading of the flat file is included in the reference for one of these attributes. A tree structure, having a plurality of nodes, is formed from the map file. All of the nodes of the tree structure are then traversed, node-by-node; and at each node, an attribute of the node is entered into the XML file. Also, each time a reference of one of the attributes matches a column heading of the legacy file, data from that column are entered into the XML file. In this way, all of the legacy data is entered into the XML file, yet the format of that file is controlled in a desired manner through use of the attributes of the map file.

Ballantyne, et al. provides a method and system for modifying program applications of a legacy computer system to directly output data in XML format. Thus, the specific problem addressed by Ballantyne, et al. is significantly different than the specific problem addressed by the present invention. In particular, this invention converts <u>data</u>, while Ballantyne, et al. converts <u>program applications</u>. Moreover, while Ballantyne, et al mentions trees and nodes, it is clear that these elements are not used in Ballantyne, et al. as they are used in the present invention – that is, to convert data to data. Instead, in Ballantyne, as discussed from column 11, line 65 to column 12, line 44, the trees and nodes are used to test whether the modified application has generated the correct output.

Baisley, et al. for converting one language model to another language model. However, this reference was cited only for its disclosure of a default naming procedure, and the reference does not disclose or teach the map file of, or the way this map file is used in, the present invention.

Independent Claims 1, 6 and 11 are being amended to emphasize the above-discussed differences between the present invention and the prior art. Specifically, the preamble of each of these claims is being amended to indicate that the claims are directed to converting text in a delimited flat file to text in a markup language specified by a document type definition file. As mentioned above, this is not what Ballantyne, et al. does. Rather, that reference modified the computer program.

In addition, each of Claims 1, 6 and 11 is being amended to indicate that the tree structure formed from the map file is for mapping the text from the flat file into a defined format in the markup language file. Neither Ballantyne, et al. nor Baisley, et al. use a tree structure of this type in this way.

The other references of record have been reviewed, and these other references, whether considered individually or in combination, also do not disclose or suggest these features of the present invention.

Because of the above-discussed differences between Claims 1, 6 and 11, and because of the advantages associated with those differences, Claims 1, 6 and 11 patentably distinguish over the prior art and are allowable. Claims 2-5 and 16 are dependent from and are allowable with Claim 1. Similarly, Claims 7-10 are dependent from, and are allowable with, Claim 6; and Claims 12-15 are dependent from Claim 11 and are allowable therewith.

In light of the above-discussion, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claims 1, 2, 5-7, 10-12 under 35 U.S.C. 102 and the rejection of Claims 3, 4, 8, 9, 13 and 14 under 35 U.S.C. 103, and to allow Claims 1-16. If the Examiner believes that a telephone conference with Applicants' Attorneys would be advantageous to the disposition of this case, the Examiner is asked to telephone the undersigned.

Respectfully submitted,

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